

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PAULO TRINDADE	X	
	:	Civil Action No.
Plaintiff,	:	1:19-cv-10717-ADB
	:	
v.	:	SUPPLEMENTAL
	:	DECLARATION OF IRWIN B.
GROVE SERVICES, INC. and VICTOR SPIVAK	:	SCHWARTZ IN FURTHER
	:	OPPOSITION TO SECOND
Defendants.	:	MOTION TO COMPEL
	:	DOCUMENT PRODUCTION
	:	
	X	

I, Irwin B. Schwartz, declare under the pains and penalties of perjury as follows:

1. I am the principal of BLA Schwartz, PC ("BLA Schwartz"), counsel of record for defendants Grove Services, Inc. ("Grove") and Victor Spivak (together, "Defendants"). The information contained in this declaration is true and correct and is based on my personal knowledge. I submit this supplemental declaration in opposition to plaintiff Paulo Trindade's ("Trindade") Second Motion to Compel Document Production (the "Second Motion to Compel").

2. Attached hereto as Exhibit A are true and correct copies of excerpts from the deposition of Jason Gordon, serving as Grove's corporate witness under Fed. R. Civ. P. 30(b)(6), taken on September 22, 2020.

SUBSRIBED TO AND SWORN TO on this 5th day of October 2020.

By: /s/ Irwin B. Schwartz
Irwin B. Schwartz

Certificate of Service

I, Irwin B. Schwartz, as attorney for defendants Grove Services, Inc. and Victor Spivak, hereby certify that on this 5th day of October 2020, I filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

Irwin B. Schwartz
Irwin B. Schwartz